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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

JUL 2 3 2015

<u>CERTIFIED MAIL – RETURN RECEIPT REQUESTED</u>

Article Number: 7015 0640 0007 6347 5391

Honorable Gayle Brill Mittler, Mayor Borough of Highland Park 221 S. Fifth Avenue Highland Park, New Jersey 08904

Re: Request for Information

Docket No. CWA-IR-15-026

EPA/NJDEP Sanitary Sewer System Compliance Evaluation Inspection

February 25, 2015

Borough of Highland Park ICIS/NPDES No. NJP000359

NJDEP Sanitary Sewer ID No. 55040

Honorable Mayor Mittler:

Please find enclosed a Request for Information ("RFI") letter, which the U.S. Environmental Protection Agency ("EPA") Region 2 is issuing to the Borough of Highland Park ("Highland Park") pursuant to Section 308(a) of the Clean Water Act ("CWA"), 33 U.S.C. §1318(a). The EPA is issuing the RFI letter to require Highland Park to provide specific information regarding the findings of the enclosed inspection report.

Section 308(a) of the CWA, 33 U.S.C. §1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. §1311 or carrying out section 402 of the CWA, 33 33 U.S.C. §1342, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the Clean Water Act, EPA may require the submission of information necessary to assess any facility/site and its related appurtenances for carrying out the provisions of the CWA.

On February 25, 2015, EPA along with representatives of the New Jersey Department of Environmental Protection ("NJDEP") conducted a Sanitary Sewer System Inspection of the Highland Park Sanitary Collection System. The enclosed inspection report lists potential non-compliance items as well as areas of concern, which are items that should be addressed to improve the operation and maintenance of the collection system. Additionally, the Middlesex County Utilities Authority ("MCUA") wastewater treatment plant ("WWTP"), which Highland Park discharges to, has had exceedances of its New Jersey Pollutant Discharge Elimination System ("NJPDES") Permit and wet weather bypassing related to high wastewater flows during periods of wet weather.

REQUEST FOR INFORMATION

Highland Park is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. §1318(a), to submit the requested information regarding the subject construction site.

- 1. Within forty five (45) calendar days of receipt of this letter, respond to the EPA in writing with the actions (including a schedule) that Highland Park has taken or will take to address: the potential non-compliance items and areas of concern identified in the enclosed inspection report.
- 2. Within ninety (90) calendar days of receipt of this Request respond to EPA in writing with:
 - a. Highland Park's most recent Infiltration/Inflow (I&I) Reduction Program document if required by MCUA and/or existing plans, cost estimate and schedules for its I&I Reduction Program.
 - b. Specific targets for the volume of I&I removal per year.
 - c. The 4 most recent Infiltration/Inflow Reduction Program Reports that were sent to MCUA
 - d. 2014 Municipal Separate Storm Sewer System Annual Report and records showing the Illicit Discharge Detection and Elimination inspections of storm sewer outfalls for 2014.

CERTIFICATION

Any documents to be submitted by Highland Park as part of this Request for Information shall be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 CFR §122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this Request for Information shall be sent by certified mail or its equivalent to the following addresses:

<u>Larry Gaugler, NPDES Team Leader</u>
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor

Marcedius T. Jameson, Director
Water and Land Use Enforcement
New Jersey Department of Environmental Protection
Mail Code 401-04F, 401 East State Street
P.O. Box 420
Trenton, NJ 08625-0420

Should you have any questions regarding this request, feel free to have your staff contact Larry Gaugler, NPDES Team Leader at (212) 637-3950.

Sincerely,

Doughlas McKenna, Chief Water Compliance Branch

Division of Enforcement and Compliance Assistance

Enclosure

cc: Marcedius T. Jameson, Director, Water and Land Use Enforcement, NJDEP

Melissa Hornsby, NJDEP via email Melissa.Hornsby@dep.state.nj.us
Thomas Sweeney, NJDEP via email Thomas.Sweeney@dep.nj.gov
Donald Rish, Supt. Public Works & Public Utilities drish@hpboro.com

	United States Environmental Protection Agenc Washington, D.C. 20460 Vater Compliance Inspection Rep	OMB No. 2040-0057
	Section A: National Data System Coding (i	i.e., PCS)
Transection Code	yr/mo/day 5 9 1 5 0 2 2 5 17	Inspection Type
2	Remarks	
Inspection Work Days Facility Self-Monitoring Eva	aluation Rating B1 QA	73 74 7 8
	Section B: Facility Data	
Name and Location of Facility Inspected (for industrial uname and NPDES permit number		Entry Time/Date Permit Effective Date 02/25/15; 9:30AM
Borough of Highland Park, Departs Valentine Ave. Highland Park, NJ		Exit Time/Date Permit Expiration Date 02/25/15; 3:30 PM
Name(s) of On-Site Representative(s)/Title(s)/Phone and	d Fax Number(s)	Other Facility Data
Robert Fullagar 732-634-1500, Licens Francis Troy, Foreman, Highland Park 1277,	ed Collection System Operator , ftroy@hpboro.com (732) 51-	NJDEP Sanitary Collection System ID No.55040
Donald Rish, Supt. Public Works & Utilities drish@hpboro.com (732)) 247-9379	
D	Evaluated During Inspection (Check only	
) Tow Wie	easurement X Operations & I	Maintenance X CSO/SSO (Sewer Overflow)
Seir-Mor	nitoring Program Sludge Handlin	ng/Disposal Pollution Prevention
Facility Site Review Complia Effluent/Receiving Water Laborate	nnce Schedules Pretreatment	Multimedia
		Other:
See attached compliance evaluation ins		
Name(s) and Signature(s) of Inspector(s	Agency/Office/Phone	and Fax Numbers Date
Murray Lantner, P.E.	EPA/DECA-WCE FAX:	3/(212) 637-3976
Signature of Management Q/A Reviewe	Agency/Office/Phone	e and Fax Numbers Date
Jam Day 1	5	o dila i di i di i di i di i

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01,

Column 18: Inspection Type*. Use one of the codes hated below to describe the type of inspection:

	The Table 1 (1997)
A	Performance Audit
	t of tour and by the te

Compliance Biomonitoring B

Compliance Evaluation (non-sampling)

Ď Diagnostio

Pretreatment (Follow-up) F

G Pretreatment (Audit)

Industrial User (IU) Inspection 1

Complaints

Multimedia

11

Compliance Evaluation (Oversight) 0

Pretreatment Compliance Inspection D

R Reconnaissance

Compliance Sampling

IU Inspection with Pretreatment Audit

Toxacs Inspection

Sludge - Biosolids Z

Combined Sewer Overflow-Sampling

Combined Sewer Overflow-Non-Sampling

Sanitary Sewer Overflow-Sampling

8 Sanitary Sewer Overflow-Non-Sampling

CAFO-Sampling

CAFO-Non-Sampling

IU Sampling Inspection

IU Non-Sampling Inspection .4 IU Toxics Inspection

5 IU Sampling Inspection with Pretreatment

IU Non-Sampling Inspection with Pretreatment 6

IU Toxics with Pretreatment

Pretreatment Compliance (Oversight)

Follow-up (enforcement)

Storm Water-Construction-Sampling

Storm Water-Construction-Non-Sampling

Storm Water-Non-Construction-Sampling

Storm Water-Non-Construction-Non-Sampling

< Storm Water-MS4-Sampling

Storm Water-MS4-Non-Sampling

Storm Water-MS4-Audit

State (Contractor)

B --- EPA (Contractor)

Corps of Engineers
Joint EPA/State Inspectors—EPA Lead

Local Health Department (State)

NEIC Inspectors

O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
 P— Other Inspectors, State (Specify in Remarks columns)

EPA Regional Inspector

State Inspector

Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.

Column 19: Inspector Code. Use one of the codes listed below to describe the lead agency in the inspection.

- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 Agricultural. Facilities classified with 1987 SIC 0111 to 0971
- 4 Federal. Facilities identified as Federal by the EPA Regional Office
- 5 Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing, and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter Ni otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude)

Section C: Areas Evaluated During Inspection

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 2, DECA-WCB

20th Floor, 290 Broadway, NY, NY 10007

SANITARY SEWER SYSTEM COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Highland Park

NJDEP Program Interest ID No.55040 Sanitary System

EPA ICIS No. NJP000359

Satellite Sanitary System of the Middlesex County Utilities Authority Wastewater Treatment Plant (NJPDES Permit No. NJ0020141)

Inspection Date: February 25, 2015 **Inspection Time:** ~9:30 to 3:30PM

EPA Inspectors:

Murray Lantner, P.E. Environmental Engineer, EPA Region 2, DECA-WCB (212) 637-3976 Cyndy S. Kopitsky, EPA Region 2, DECA-WCB, 212.637.3832. Kopitsky.cindy@epa.gov

NJDEP Inspector:

Thomas Sweeney, Env. Specialist, NJDEP, Central Bureau of Water Compliance and Enforcement Thomas.Sweeney@dep.nj.gov, (609) 292 3010, Cell (609) 439-9531

On-Site Representatives:

Donald Rish, Supt. Public Works & Public Utilities drish@hpboro.com (732) 247-9379

Robert Fullagar 732-634-1500, Licensed Collection System Operator

Francis Troy, Foreman, Highland Park, ftroy@hpboro.com (732) 51-1277, Borough of Highland Park, DPW, 444 Valentine Ave. Highland Park, NJ

Site Information:

Borough of Highland Park, Department of Public Works, 444 Valentine Street, Highland Park, NJ, 08904

Precipitation Information: New Brunswick NJ -0.00" on 12/4/14, 0.21" on 12/3/14; and 0.14" on 12/2/14 http://www.njweather.org

I. Introduction

- 1. EPA conducted a Sanitary Sewer System Compliance Evaluation Inspection ("CEI") on February 25, 2015 of the Borough of Highland Park's ("Highland Park's") Sanitary Sewer System.
- 2. Highland Park's population, based upon 2010 census information, was 13,982 people and its area covers about 1.8 square miles.
- 3. Highland Park operates a 100% separate sanitary sewer system and there are no sanitary pump stations. The sanitary sewer system is approximately 152,000 feet (28.8 miles). The sanitary sewer pipes date 80 to 90 years and range in diameter from 8" to 15". Manhole spacing was said to be approximately every 300 to 500' with average spacing of 300 to 350'. All lateral lines were said to be the homeowner's responsibility.

- 4. Sanitary flows from Highland Park flow to through MCUA metering chambers at Cleveland Ave.(North), River Road and Donaldson Park (South). There are no upstream contributors to Highland Park's sanitary system.
- 5. Highland Park said that 2 years ago they cleaned (jetted) the entire collection system. Representatives said that they have a list of known problem spots (roots) and will add a biocide. In terms of CCTV work Highland Park said that they share resources with Edison. If they have big job will have to contract it out. Generally CCTV work is done as part of a repaying project.
- 6. Fats Oils and Grease (FOG) Highland Park representatives said that the County Board of Health, Health inspector, conducts annual restaurant inspections and also checks grease traps. They said that residential grease is not generally a problem. They explained that they add the dry bacteria for grease reduction at 4 locations, twice per week, one location is behind Brookdale Court. Town Code Enforcement can also check grease traps (more likely upon installations).
- 7. Water billing Representatives said that they have 200 Automatic Meter Readers in place, but outside of that they spend several months reading water meters.
- 8. Representatives explained that there is a local ordinance against sump pump connections to the sanitary sewer. As shown in attachment 3, Highland Park has a program to inspect for illegally connected sump pumps.
- 9. Representatives explained that they have a list of known trouble spots where they conduct weekly checks and monthly checks and conducting cleaning/jetting in these locations.
- 10. Map of system Highland Park's sanitary sewer map was available in hard copy (See Photo DSCN2663 ("2663") in Attachment 1.
- 11. Sewer bills are based upon water consumption, but sewer bills are reduced 15% off for pools and sprinklers. This is done through the billing department, bills were not available.

II. Summary of Potential Noncompliance and Areas of Concern

A. Potential Noncompliance

1. Highland Park said that they had reported a Sanitary Sewer Overflow ("SSO")/spills in 2007. Representatives said that there were no SSOs in the past five years except for during larges storms (like Hurricanes Irene and Sandy). However, review of NJDEP Data Miner incident reports

http://datamine2.state.nj.us/DEP_OPRA/OpraMain/categories?category=Incidents+and+Complaints for Highland Park did not show that incidents (sanitary sewer overflows or sewage flows) were reported during or following Hurricane Irene (Aug. 28, 2011) nor during or following Hurricane Sandy on October 29, 2012 and continuing. Review of

Data Miner incident reports (Attachment 2) for the Period January 1, 2010 to the June 15,

2015 contained 2 incident reports related to sewage overflows during a storm event dated December 22, 2012 and January 8, 2013. Highland Park must determine if there are capacity issues or excessive I&I that caused sewage overflows that were reported on 12/22/12 and 1/8/13. Discharges of sewage to surface waters without a Permit does not conform with Section 301 of the Clean Water Act. Additionally, all Sanitary Sewer Overflows must be reported to NJDEP, even those that take place during large storm events like Hurricanes Irene and Sandy.

B. Areas of Concern:

- 2. Highland Park does not have written procedures to respond to overflows and spills. It is recommended to have written procedures to address sewage overflows and basement backups to cease the overflows/backups and to clean up after the overflows and provide information to building owners on how to safely clean up after a backup.
- 3. Highland Park said that their collection system is insured under the Joint Insurance Fund and provided EPA with insurance claims for backups for the period 2010 to Feb. 2015 and are shown in the table below.

Table 1: Insurance Claims for Highland Park Sewage 2010 to Feb. 2015

	Claim No.	DOL	Status	Total Incurred	Total Paid	Address	Loss Description
1	X26701	2/9/2012	Closed	\$0	\$0	414 Graham St.	TWP S/LINE BLOCKAGE CAUSED DAMAGE
2	X62410	3/31/2013	Closed	\$0	\$0	66 Harrison St.	SEWER BACKED UP IN BASEMENT
3	2014070740	12/30/2013	Closed	\$0	\$0	123 Highland Ave.	SEWER BACK UP INTO BASEMENT
4	2014070573	1/6/2014	Closed	\$0	\$0	49 Brookdale Ct.	CLMT ALLEGES SEWER BACKUP INTO BASEMENT

4. EPA recommends that the location of blockages of Highland Park sanitary main lines be entered into a GIS system or spreadsheet with different column for address and street and if possible a summary of the cause of blockage, so Highland Park can identify problem areas that require additional inspection/cleaning and/or repair work Table 2 below is contains a summary of the collection system monthly reports for the period 2011 to 2014.

Table 2: Summary of Collection System Monthly Reports 2011 to 2014

	Total Sew	er Miles	28.8	Total Feet	152064		
Year	FT of Sewer Cleaned	Percenta ge of Sewer System Cleaned Per Year	FT of Sewer Televised	Percentage of Sewer System Televised Per Year	Main Blockage	No. of Main Blockages Per 100 Miles of Sewer Per Year	Lateral Blockage
2011	58,524	38.5%	0	0.0%	8	27.8	36
2012	58,505	38.5%	0	0.0%	10	34.7	17
2013	52,119	34.3%	430	0.3%	12	41.7	25
2014	58,798	38.7%	0	0.0%	10	34.7	27

- 5. Typically Section 5(I) of the Participant Supplemental Agreement with MCUA states, "Infiltration/Inflow Each Municipality and all public corporations discharging sewage into the Local Sewage System of a Municipality will maintain its Local Sewerage System in such a manner as to exclude any excessive infiltration and/or inflow from entering into the Local Sewerage System." As shown in Table 3 below several MCUA metering chambers that receive Highland Park's sanitary flows show a 2.5x increase (Flow difference 150% or greater than dry weather flows) in wet weather flows. Highland Park must include measures in its MCUA mandated I&I reduction plan to eliminate excessive I&I from its sanitary system. Also please note that MCUA's CSO Permit, described below, will require MCUA to implement MCUA to control excessive I&I in its satellite systems.
- 6. Part IV.F.1.h of MCUA's NJPDES Permit NJ0020141 which will take effect on July 1, 2015 requires that the permittee (MCUA) shall review its rules, ordinances, and/or its sewer use agreements and create an anticipated schedule to revise them within 6 months of the Effective Date of the Permit (EDP) if necessary. In general, this schedule shall not extend beyond the due date for the LTCP as per Part IV.D.3.b.iv of the Permit. This schedule shall require the customer municipalities to:
 - i. operate and maintain their treatment works,
 - ii. identify I/I and reduce it to meet the definition of non-excessive infiltration (in combined and separately sewered areas) and non-excessive inflow (in separately sewered areas) where both terms are defined in N.J.A.C. 7:14A-1.2, and
 - iii. identify and eliminate interconnections and cross-connections in storm sewers.
- 7. "Nonexcessive infiltration" means the quantity of flow which is less than 120 gallons per capita per day (domestic base flow and infiltration) or the quantity of infiltration which cannot be economically and effectively eliminated from a sewer system as determined in a cost-effectiveness analysis. For domestic treatment works receiving wastewater from combined sewers, nonexcessive infiltration means the quantity of flow attributable to

infiltration during dry weather shall be less than 40 gallons per capita per day (gpcd) or 1,500 gallons per day per inch diameter per mile of sewer.

- 8. "Nonexcessive inflow" means the maximum total flow rate during storm events which does not result in chronic operational problems related to hydraulic overloading of the treatment works or which does not result in a total flow of more than 275 gallons per capita per day (domestic base flow plus infiltration plus inflow) during a significant rainfall event which causes surface ponding and surface runoff. Chronic operational problems may include surcharging, backups, bypasses, and overflows.
- 9. Based on the threshold of 275 gallons per capita per day (gpcd) and Highland Park's population of 13,982 flows above 3.845 MGD exceed the nonexcessive inflow threshold. As shown in Table 3 below based upon data in MCUA's I&I reports for the period 2011 to 2014, during significant rainfall events, total flows in Highland Park's separate sewer system, exceeded the 3.845 MGD threshold for non-excessive inflow in 2011, 2012, 2013, 2014 with the highest daily flows in each year was 19.6, 13.8, 17.4, and 19.6 MGD respectively.

Highland Park representatives explained that they are working to reduce sump pump discharges and are looking for the sump pump connections. They explained that their I&I Reduction Plan for MCUA is focused on sump pumps, since there were said to be a lot of sump pumps tied into sanitary sewer laterals (See Attachment 3). Highland Park's goal is to do 1 sump pump inspection per day or 5 per week and they are now in the 3rd quarter for sump pump inspections (program started in June 2014). Representatives said that any time Highland Park personnel goes into a house - when a house is sold, a final reading, read a water meter, a high bill, basement backup - personnel will look for illegally connected sump pumps. If there is a connected sump pump they will tell the homeowner verbally first, then go back and check it and verify that the sump pump has been disconnected. The triangle area of Highland Park was thought to have the most illicit sump pump connections. Personnel thought this to be a good approach prior to doing CCTV and smoke testing. Records of the sump pump inspections are included in the Collection System Monthly Reports and a summary is produced as part of the I&I Reduction plan, Attachment 2. Highland Park said that they conducted CCTV work back in 2008, said they did some grouting.

10. Field Work

EPA conducted field work and inspected several manholes in Highland Park's Sanitary Sewer System that mainly had past problems and made the following findings:

- a. There were bricks at the bottom of the sanitary manhole at 428 Felton (Photos 664 and 665). The bricks need to be removed;
- b. Downstream of 345 Madison there was a brick in the sewer. The bricks need to be removed;
- c. There were some rags on the ladder at the sanitary manhole at 408 Marlboro (See Photo 2668);

- d. Benner and South 4th there were some rags and debris in sewer. (See Photo 2666)
- e. Sewer at 66 Harrison has flat slope some debris in sewer needs cleaning (See Photos 2669 and 2670).
- 11. Part I.F.6.b.iii of the NJDEP Tier A Municipal Separate Storm Sewer System Permit requires that, "annual certifications shall also include the number of outfalls physically inspected, the number of outfalls found to have dry weather flow, the number of illicit connections found and the number of illicit connections eliminated. Copies of inspection reports shall be submitted with the annual certification for those outfalls found to have dry weather flow." Please submit the most recent MS4 annual report and records of the outfall inspections conducted in 2014.

III. Closing Conference

A closing conference was held with Highland Park representatives to discuss many of the findings that were identified during this inspection.

IV. Attachments

- 1. EPA Photos
- 2. Incident Reports reported Sewage Overflows Highland Park
- 3. I&I Reduction Quarterly Reports Sump Pump Disconnection Program
- 4. Collection System Monthly Reports Example January. 2014

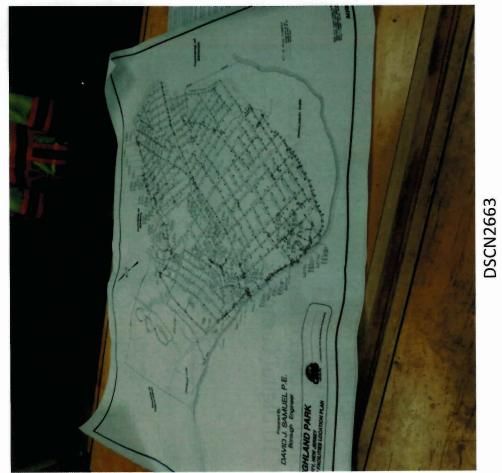
C:\Users\Mlantner\Documents\My_Documents\My_Documents\EPA\insp 2013\mcua\MCUA Satellites\Edison\Edison 2015 SSO CEI.docx

Table 3: Comparison of dry and wet weather flows for Highland Park from MCUA's Annual I&I Reports

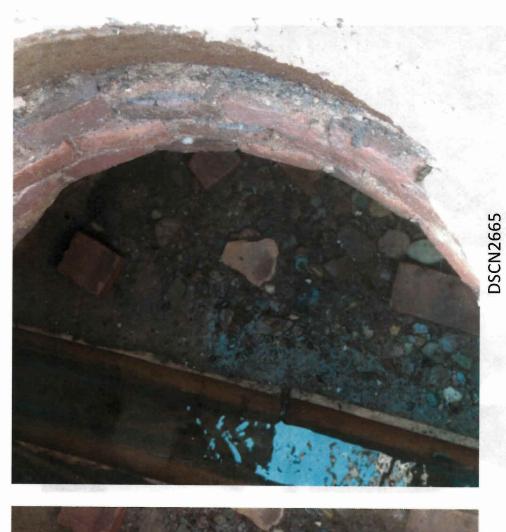
	2011 Max	2011 Max		2012 Max	2012 Max		2013 Max	2013 Max		2014 Max	2014 Max	
Connection	Difference between wet and dry weather flows (MG)	Percent Difference for those 150 % Greater (%)	2011 Dry Period	Difference between wet and dry weather flows (MG)	Percent Difference for those 150 % Greater (%)	2012 Dry Period	Difference between wet and dry weather flows (MG)	Percent Difference for those 150 % Greater (%)	2013 Dry Period	Difference between wet and dry weather flows (MG)	Percent Difference for those 150 % Greater (%)	2014 Dry Period
North	4.180	182	2.30	4.018	187	2.152	5.076	245	2.071	4.685	207	2.26
South	4.156	282	1.474	3.688	312	1.182	4.563	478	0.954	7.111	682	1.043
River View (landing lane)	6.166	476	1.294	1.407	104	1.353	3.362	247	1.361	3.194	260	1.266

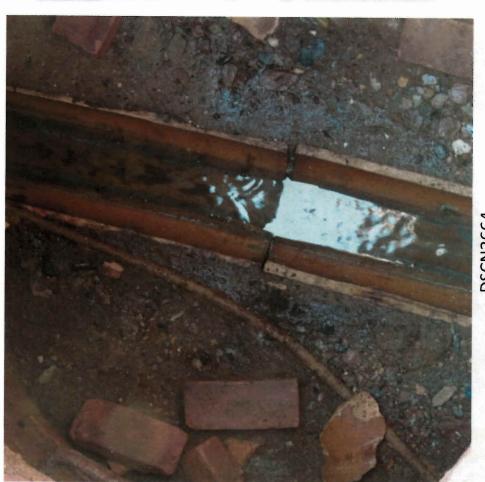
ATTACHMENT 1 – Highland Park SSO Inspection, February 25, 2015, Unedited Digital Photographs					
	Nikon Coolpix P510, Murray Lantner, P.E. Env. Eng. EPA Region 2, DECA-WCB				
Photolog	Description				
DSCN2662	Monthly Cleaning List				
DSCN2663	Sanitary Sewer Map				
DSCN2664	Bricks in Sewer 428 Felton				
DSCN2665	Bricks in Sewer 428 Felton				
DSCN2666	Benner and South 4 th Street – Some Rags and Debris in Sewer				
DSCN2667	Manhole insert to prevent inflow (at 408 Marlboro)				
DSCN2668	Debris on top ladder rung and debris in Manhole at 408 Marlboro				
DSCN2669	1206 Harrison – Buildup of material in sewer – needs cleaning				
DSCN2670	1206 Harrison – buildup of material in sewer needs cleaning.				
DSCN2671					
DSCN2672	Fuel Tank at Highland Park Public Works Facility				

Attachment 1 – Photos - Borough of Highland Park Sanitary Sewer System Inspection, February 25, 2015 Unedited Digital Photos Taken by M. Lantner, USEPA Region 2, DECA-WCB with Nikon Coolpix P510 Digital Camera

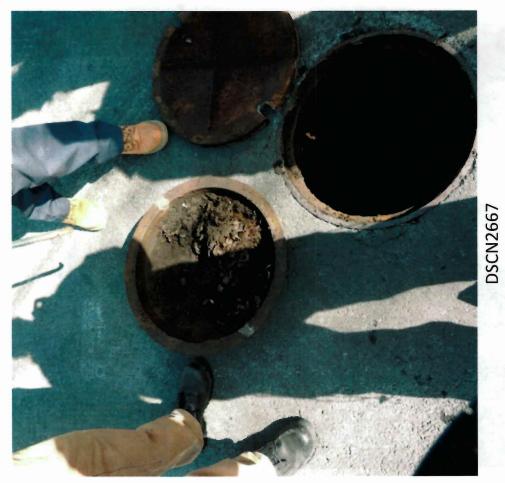


DSCN2662

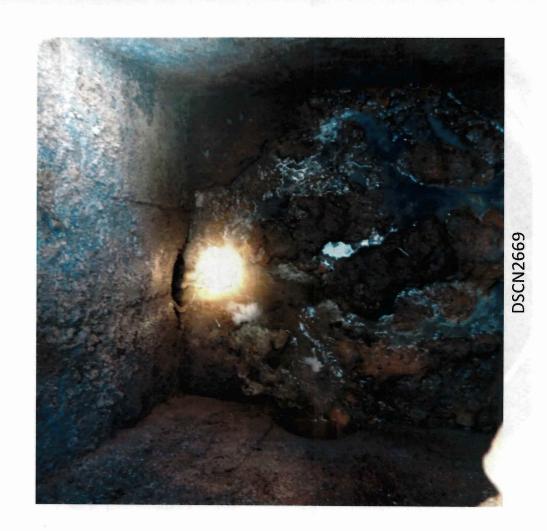




DSCN2664

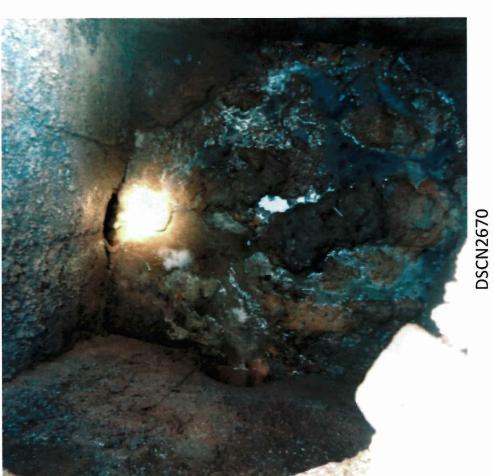


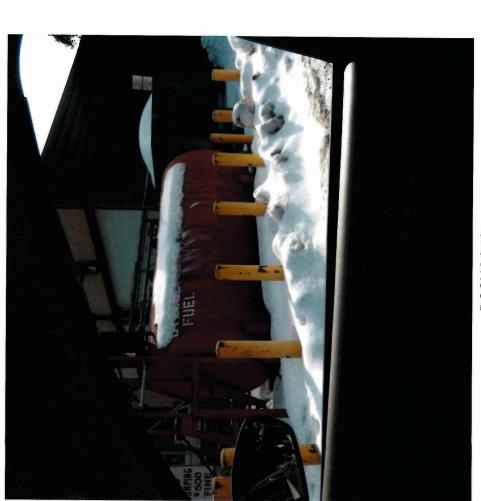












DSCN2672

ATTACHMENT 2 – Incident Reports in Highland Park containing the word sewage January 1, 2010 to June 15, 2015 (that were not odor complaints)

دون دا	Commencer Contra	Ommercant overage rain	040004 Dan to 01101
Incident ID Numbe	er: 473208	Communications Center Nu	ımber: 12-12-22-1711-34
Received Dat	te: 12/22/2012		
Incident Descriptio	CALLER IS REPORT ENDED AT 13:42	ING AN UNCONTROLLED OVER	FLOW DUE TO EXCESSIVE RAIN FAL
Incident Type Program	m: Water Quality		
Incident Typ	e: Sewage		
Follow-up Statu	ıs:		
Program Interest Nam	ie:		
Program Interest II	D:		
Most Recent Compliane Evaluation		Most Recent Enforcement Action:	
Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status

Sewage

454549

Communication Center

Closed, Inv-no viol

Received Date: 1/8/2013

456235

UNCONTROLLED OVERFLOW DUE TO STORM EVENT. ENDED 12/27 12:15 Incident Description:

Most Recent

Communications Center Number:

13-01-08-2225-49

Water Quality Incident Type Program:

> Incident Type: Sewage

Follow-up Status:

Incident ID Number:

Program Interest Name:

Program Interest ID:

Most Recent Compliance Evaluation:

Enforcement Action:

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
456190	Communication Center	Sewage	Closed. Inv-no viol

Affachmen 3

January 8, 2015

Mr. Kevin T. Aiello, Administrator – Environmental Quality Middlesex County Utilities Authority 2571 Main Street P.O. Box 159 Sayreville, New Jersey 08872-0159

Re:

c:

I&I Reduction Plan - Quarterly Report

Dear Mr. Aiello:

The following I&I Reduction Plan data is respectfully submitted on behalf of the Borough of Highland Park.

1&1 Reduction Plan	Quarter	YTD Total	Plan Total
Sump pump inspections	69	95	95
Illegal connections found	1	4	4
Illegal connections removed	1	4	4

Enclosed please also find a corrected third quarter version, the type error was noted at the time this report was prepared.

Should you have any questions or comments, please feel free to contact me at 732-634-1500.

Sincerely,

Robert K. Fullagar Licensed Operator October 8, 2014 Revised 1-8-15

Mr. Kevin T. Aiello, Administrator – Environmental Quality Middlesex County Utilities Authority 2571 Main Street P.O. Box 159 Sayreville, New Jersey 08872-0159

Re:

c:

I&I Reduction Plan - Quarterly Report

Dear Mr. Aiello:

The following I&I Reduction Plan data is respectfully submitted on behalf of the Borough of Highland Park.

Quarter: Third	Year: 2014
·	

I&I Reduction Plan	Quarter	YTD Total	Plan Total
Sump pump inspections	26	26	26
Illegal connections found	3	3	3
Illegal connections removed	3	3	3

Should you have any questions or comments, please feel free to contact me at 732-634-1500.

Sincerely,

Robert K. Fullagar Licensed Operator

Donald Rish, Borough of Highland Park

Attachment y

COLLECTION SYSTEM MONTHLY FEFORT

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List the additions/deletions to the initial list of industrial/commercial discharges:

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Check if no Addition/Deletions in this report period.

Ucensed Operator __

Signature

*First Report due 2/10/98 should include the initial list of industrial
Commercial Dischargers.

HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date:	1/27/14					
Name:						
Address:	42 50.6	The Ave				
Telephone:	42 50.67h Ave (609) 896-0645					
	Borough Main					
<u>Įf Homeown</u>	er's Lateral:					
	Was Home Notified?	Yes No				
*	By Telephone	In Person_				
If Borough's	Main:					
	Any Other Home On Street	t Backed Up: Yes No				
	How Many Manholes Back	ked Up?				
*	Materials Removed From Main (Be Specific)					
	Upon Basement Entry: Approximate Amount of Water on Floor:					
	Where Did Sewer Back Up	?				
Approximate Amount of Damage?						
Name of Contractor: ROTO ROTTER Phone Number:						
Approximate Gallons of Water Used: 330						
Footage Cleaned: 300						
Time Arrived: 9.50 Time Completed: 10.45						
Operator Signature:						

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HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date:	1-7-14.	 -
Name:		_
Address:	49 Brook DALE	
Telephone:		
	Borough Main Homeowner's Lateral	
. If Homeowr	ner's Lateral:	
	Was Home Notified? Yes No	
	By Telephone In Person	
If Borough's	Main:	•,
	Any Other Home On Street Backed Up: Yes No	-
	How Many Manholes Backed Up?	
*	Materials Removed From Main (Be Specific) 5000 R CAME From TOLLET ON THE	
	Upon Basement Entry: Approximate Amount of Water on Floor: Where Did Sewer Back Up?	HOR DIS
		HAVE BEER BOLD MAIN
Was A Cleani Yes	Approximate Amount of Damage?	1-7-14
Name of Con	stractor: JACK OOLAR. Phone Number:	
Approximate	Gallons of Water Used:	
Footage Clear	ned:	
Time Arrived:		*
Operator Gan	ature. G-Can	*

HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date:	112/14					
Name:						
Address:	315 W	AYNE ST				
Telephone:						
	Borough Main	Homeowner's Lateral				
<u>[f Homeown</u>	er's Lateral:					
	Was Home Notified?	YesNo				
*	By Telephone	In Person				
If Borough's I	Main:					
*.	Any Other Home On Stree	t Backed Up: Yes No				
	How Many Manholes Back	ked Up?				
×	Materials Removed From N	Main (Be Specific)				
	X					
	Upon Basement Entry: Approximate Amount of W	•				
,	Where Did Sewer Back Up?					
	Approximate Amount of Dang Contractor Called Prior t					
Name of Cont	ractor:	Phone Number:				
Approximate (Gallons of Water Used:	200				
Footage Cleaned: 240						
Time Arrived:_	Time C	Completed:				
Operator Signa	ature:	4/6				